



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

AAS:DKK/JN  
F.#2017R05903

*271 Cadman Plaza East  
Brooklyn, New York 11201*

April 24, 2020

By E-mail and ECF

The Honorable Ann M. Donnelly  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Huawei Technologies Co., Ltd., et al.  
Criminal Docket No. 18-00457 (S-3) (AMD)

Dear Judge Donnelly:

The government's response briefs in opposition to the motions filed by defendants Huawei Technologies Co., Ltd., Huawei Device Co., Ltd., Huawei Device USA Inc. and Futurewei Technologies, Inc. (collectively, "Huawei") seeking the Court's authorization to downgrade more than 21,000 Sensitive Discovery Material documents and to share all Rule 16 material and any Brady disclosures with co-defendant Meng Wanzhou are currently due on Monday, April 27, 2020. In order to properly address both of Huawei's motions and to potentially raise information that the government has recently learned and is still evaluating, the government respectfully requests that the due date for its reply be changed to May 7, 2020. The government reached out to defense counsel this morning and they indicated that they would need to consult with their client. Because the responses are due on Monday, we submit the instant

request prior to receiving the defendant's position, in an effort to obtain a decision from the Court in advance of the current deadline.

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney  
Eastern District of New York

By: /s/ Julia Nestor  
Alexander A. Solomon  
Julia Nestor  
David K. Kessler  
Sarah M. Evans  
Assistant U.S. Attorneys  
(718) 254-7000

DEBORAH L. CONNOR  
Chief  
Money Laundering and Asset Recovery Section  
Criminal Division, U.S. Department of Justice

Laura M. Billings  
Christian J. Nauvel  
Trial Attorneys

JAY I. BRATT  
Chief  
Counterintelligence and Export Control Section  
National Security Division, U.S. Department of Justice

Thea D. R. Kendler  
David Lim  
Trial Attorneys

Enclosure

cc: Defense counsel (by ECF)  
Clerk of the Court (by ECF)